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*Proposed Counsel for the Debtor and  
Debtor in Possession*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re : Chapter 11  
:   
Retrieval-Masters Creditors Bureau, Inc.,<sup>1</sup> : Case No. 19-23185 (RDD)  
:   
Debtor. :   
-----X

**CERTIFICATE OF NO OBJECTION REGARDING  
DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER:  
(I) TO RETAIN AND EMPLOY MORVILLO ABRAMOWITZ  
GRAND IASON & ANELLO P.C. AS SPECIAL REGULATORY  
COUNSEL, *NUNC PRO TUNC* AS OF THE PETITION DATE;  
AND (II) GRANTING CERTAIN RELATED RELIEF**

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number is 9495. The location of the Debtor's service address for purposes of this chapter 11 case is 4 Westchester Plaza, Suite 110, Elmsford, NY 10523. The Debtor also does business as American Medical Collection Agency.

TO THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746 and in accordance with this Court's case management procedures set forth in the *Order Granting Debtor's Motion For Order Authorizing The Establishment Of Certain Notice, Case Management, And Administrative Procedures* [Dkt. No. 31] (the "**Case Management Order**"), the undersigned hereby certifies as follows:

1. On June 17, 2019 (the "**Petition Date**"), Retrieval-Masters Creditors Bureau, Inc. (the "**Debtor**") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code. The Debtor is operating its business and managing its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On July 2, 2019, the Office of the United States Trustee appointed the Official Committee of Unsecured Creditors in this Chapter 11 Case. *See* Notice Appointing Creditors Committee [Doc. No. 44].

3. On July 30, 2019, the Debtor filed its *Application for an Order: (I) to Retain and Employ Morvillo Abramowitz Grand Iason & Anello P.C. as Special Regulatory Counsel, Nunc Pro Tunc as of the Petition Date; and (II) Granting Certain Related Relief* [Dkt. No. 91] (the "**Application**").

4. The Application established a deadline of **September 5, 2019 at 4:00 p.m (EDT)** (the "**Objection Deadline**") for parties to object or file responses to the Application.

5. The Objection Deadline has passed, and, to the best of my knowledge, no objection, responsive pleading, or request for a hearing with respect to the Application has been (a) filed with the Court on the docket of the above-captioned case or (b) served on counsel to the Debtor<sup>2</sup>.

6. Accordingly, the Debtor respectfully requests that the Proposed Order granting the relief requested in the Application, annexed hereto as **Exhibit A** (the “**Proposed Order**”), be entered in accordance with the Case Management Order.

Dated: September 12, 2019  
New York, New York

CHAPMAN AND CUTLER LLP  
*Proposed Counsel for the Debtor and  
Debtor in Possession*

By: /s/Steven Wilamowsky  
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<sup>2</sup> The Debtor received informal comments to the Application from the Office of the United States Trustee, which are incorporated in the Proposed Order.

**EXHIBIT A**

**PROPOSED ORDER**

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*Proposed Counsel for the Debtor and  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
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Retrieval-Masters Creditors Bureau, Inc.,<sup>1</sup> : Case No. 19-23185 (RDD)  
:   
Debtor. :   
-----X

**REVISED PROPOSED ORDER AUTHORIZING THE DEBTOR TO  
RETAIN AND EMPLOY MORVILLO ABRAMOWITZ GRAND  
IASON & ANELLO P.C. AS SPECIAL REGULATORY COUNSEL,  
EFFECTIVE NUNC PRO TUNC TO THE PETITION DATE**

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
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Retrieval-Masters Creditors Bureau, Inc.,<sup>1</sup> : Case No. 19-23185 (RDD)  
 :  
Debtor. :  
-----X

**ORDER AUTHORIZING THE DEBTOR TO RETAIN AND EMPLOY MORVILLO  
ABRAMOWITZ GRAND IASON & ANELLO P.C. AS SPECIAL REGULATORY  
COUNSEL, NUNC PRO TUNC AS OF THE PETITION DATE**

Upon the application (the “**Application**”)<sup>2</sup> of the debtor and debtor in possession (the “**Debtor**”) in the above-captioned case for entry of an order (this “**Order**”) authorizing the Debtor to retain and employ Morvillo Abramowitz Grand Iason & Anello P.C. (“**Morvillo**”) as special regulatory counsel effective *nunc pro tunc* to the Petition Date, pursuant to section 327(e) of title 11 of the United States Code (the “**Bankruptcy Code**”); and the Court having reviewed the Application and the Declaration of Richard Weinberg, a partner of Morvillo (the “**Weinberg Declaration**”); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that the Application is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found based on the representations made in the Application and in the Weinberg Declaration that Morvillo neither has nor represents an interest materially adverse to the interest

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

of the Debtor or its estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in, the Debtor or for any other reason as required by section 327(e) of the Bankruptcy Code; and the Court having found that the relief requested in the Application is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and the Court having found that the Debtor provided adequate and appropriate notice of the Application under the circumstances and that no other or further notice is required; and the Court having reviewed the Application and having heard statements in support of the Application at a hearing held before the Court (the "**Hearing**"); and the Court having determined that the legal and factual bases set forth in the Application and at the Hearing establish just cause for the relief granted herein; and any objections to the relief requested herein having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. The Debtor is authorized to retain and employ Morvillo as special regulatory counsel in this chapter 11 case, pursuant to section 327(e) of the Bankruptcy Code, Bankruptcy Rule 2014(a) and Local Bankruptcy Rule 2014-1 on the terms and conditions set forth in the Application and the Engagement Letter, *nunc pro tunc* as of the Petition Date.
3. Morvillo shall be compensated for its services and reimbursed for any related expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules and any other applicable orders or procedures of this Court.
4. Morvillo shall apply any remaining amounts of its prepetition retainer as a credit toward postpetition fees and expenses, after such postpetition fees and expenses are approved

pursuant to the first Order of the Court awarding reimbursement of fees and expenses to Morvillo.

5. The Debtor and Morvillo are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Application.

6. Notice of the Application as provided therein is deemed to be good and sufficient notice of such Application, and the requirements of the Local Bankruptcy Rules are satisfied by the contents of the Application.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

9. Notwithstanding any provision to the contrary in the Engagement Letter, the Debtor shall not make any advance payments to Morvillo without Court order.

10. Morvillo shall use its best efforts to avoid any duplication of services provided by any of the Debtor's other retained professionals in this chapter 11 case.

11. Notwithstanding any provision to the contrary in the Engagement Letter, any dispute relating to the services provided by Morvillo shall be referred to arbitration consistent with the terms of the Engagement Letter only to the extent that this Court does not have, retain or exercise jurisdiction over the dispute.

12. To the extent there is an inconsistency among this Order, the Application and the Engagement Letter, the terms of this Order shall govern.



Dated: \_\_\_\_\_, 2019  
White Plains, New York

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THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE